Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, C.C. 20554

In the Matter of)		
)	NPRM 05-2	35	
Amendment of Part 97 of the	ne (Commission's)
Rules To Implement WRC-	03	Regulations)
Applicable to Requirements	s fo	r Operator)	
Licenses in the Amateur Ra	adic	Service)	

I would like to submit for your review and consideration my comments concerning NPRM 05-235.

As of 2000 there were a total of 192 countries in the IARU (International Amateur Radio Union). Of these members about 12% have removed the Morse code testing as part of their requirement to obtain an Amateur radio license. Of the 12% of these countries the number of licensed stations is approximately 331,152. Compared to the total number of licensed stations around the world, approximately 2,789,720, that is not many. These countries that have removed the Morse code requirement have very few licensed operators.

Yet countries such as Japan, which has the second most number of licensed amateur stations, has decided to continue with requiring the Morse code testing at least for some level of license. Those that state that the rest of the world is removing the Morse code requirement are not stating facts but beliefs or wishes.

Why then should the United States, seen as a leader around the world, follow suit? Many state that the Morse code testing is a barrier for gaining access to the High Frequency (HF) spectrum. Yet it was the FCC that allowed incentive licensing years ago to promote

people to gain access to some of the spectrum allocated to Amateur radio operators in that they may build their skills and gradually obtain additional spectrum. Yet a number of people were wanting more spectrum, yet prefer to abstain from putting forth the effort required for the additional privileges.

The FCC made a rule change that only required a minimum of 5 words per minute code speed and a written examination to gain access to the HF spectrum. In the opinion of the FCC that was to allow those to further move up the ladder and upgrade and gain more privileges. This now is being fought by those that prefer again to do the minimum amount of work to obtain that which they do not have. The constant reducing of requirements to obtain a license in the Amateur Radio Service is only reducing the pool of qualified operators should this country come to need them.

There has been arguments that there are many qualified individuals that are being hampered by the Morse code requirement. Individuals with degrees in various professions. If these individuals are qualified as stated, it would only seem logical that these individuals would have an understanding that to work for something is better than to have to simply given to them. Many are aware that the current written examinations are excessively easy to pass. The NCVEC has stated that the examinations are too complex and the material covered to obtain an Amateur license needs to be simplified even further. With this way of thinking there really would be no challenge nor personal satisfaction in obtaining said license.

To remove the Morse code testing completely from the requirements to obtain a license would further reduce the quality of operator needed should this country require them. If it is deemed necessary to remove the Morse code requirement then I believe it should at the very minimum be retained for the Amateur Extra license requirement.

The Amateur Extra class has always been looked upon as the pinnacle of Amateur radio. One who has the skill to operate the many modes that are available. One who has worked hard and honed their skills and has increased their knowledge in many facets of the service. This should be one class of license that should somewhat difficult

to obtain. One that people must work towards, not merely memorize the questions and answers to a publicly available syllabus that anyone can memorize.

The "radio art" is a culmination of skill and knowledge. Morse code is a skill. To obtain this skill one needs to work towards perfecting it. It is not something that can be perfected in a few hours or a few days. Many people continue to use Morse code, and constantly perfecting this skill. To merely sit at a computer and operate one of the many modes available to amateur operators is quite simple and requires no real skill. To operate on phone requires no true skill either. Morse code is the second most used mode here in the United States, if not the world. One needs to simply look at some of the DX clusters on the Internet to verify this fact.

In closing I deeply request the FCC consider retaining the Morse code testing requirement for all license classes or at the minimum for the Amateur Extra class. I am not in favor of NPRM 05-235 as currently written.

Respectfully,

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